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ATTORNEYS FOR PLAINTIFF

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

DIANA WILLIAMS, <div style="text-align: right;">Plaintiff,</div> <div style="text-align: center;">against</div> THE CITY OF NEW YORK, <div style="text-align: right;">Defendant.</div>
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Civ No.: 12-CV-06805 (VEC)

**DECLARATION OF
ANDREW ROZYNSKI, ESQ.**

The following declaration is made pursuant to 28 U.S.C. § 1746:

1. I am a member of the the law firm of Eisenberg & Baum, LLP, Attorneys for Plaintiff Diana Williams in the above-captioned matter. I am familiar with the facts stated below. I submit this declaration in support of Plaintiff's Opposition to Defendant's Motion for Partial Summary Judgment.

2. Attached hereto as Exhibit A is a true and correct copy of excerpts of the deposition transcript of Carol Ann Roberson, dated September 29, 2014.

3. Attached hereto as Exhibit B is a true and correct copy of the Settlement Agreement entered into between the City of New York and the United States of America, dated November 18, 2009.

4. Attached hereto as Exhibit C is a true and correct copy of excerpts of the deposition transcript of Nicole Sabella, dated September 10, 2014.

5. Attached hereto as Exhibit D is a true and correct copy of excerpts of the deposition transcript of Christopher Williams, dated August 8, 2014.

6. Attached hereto as Exhibit E is a true and correct copy of excerpts of the deposition transcript of Diana Williams, dated January 27, 2014.

7. Attached hereto as Exhibit F is a true and correct copy of an NYPD SPRINT Report, dated September 11, 2011.

8. Attached hereto as Exhibit G is a true and correct copy of excerpts of the deposition transcript of David Rivera, dated August 6, 2014.

9. Attached hereto as Exhibit H is a true and correct copy of excerpts of the 50-H Hearing transcript of Diana Williams, dated March 6, 2012.

10. Attached hereto as Exhibit I is an Affidavit of Diana Williams, dated February 13, 2015.

11. Attached hereto as Exhibit J is a true and correct copy of excerpts of the deposition transcript of Gillio Costanzo, dated August 21, 2014.

12. Attached hereto as Exhibit K is a true and correct copy of excerpts of the first deposition transcript of Christopher Romano, dated April 4, 2014.

13. Attached hereto as Exhibit L is a true and correct copy of excerpts of the second deposition transcript of Christopher Romano, dated October 9, 2014.

14. Attached hereto as Exhibit M are true and correct copies of the booking sheets of Diana Williams (Bates Stamped D4024-4027) and Lorena White (Bates Stamped D4030-4033), dated September 11, 2011.

15. Attached hereto as Exhibit N is a true and correct copies of photographs of Diana Williams and Lorena White, Bates Stamped D4038, D4046, D4216, NYC000214.

16. Attached hereto as Exhibit O is a true and correct copy of excerpts of the deposition transcript of Justin Meehan, dated August 12, 2014.

17. Attached hereto as Exhibit P is a true and correct copy of a Richmond County District Attorney's 343 Form, Bates Stamped D 4018, dated September 12, 2014.

18. Attached hereto as Exhibit Q is a true and correct copy of excerpts of the report of Plaintiff's Linguistics Expert, Dr. Judy Kegl, dated August 13, 2014.

19. Attached hereto as Exhibit R is a true and correct copy of the Arrest Sheet of Diana Williams, Bates Stamped NYC 000212-000213, NYC 000037-000039, dated September 11, 2011.

20. Attached hereto as Exhibit S is a true and correct copy of excerpts of the deposition transcript of Daniel Watson, dated August 14, 2014.

21. Attached hereto as Exhibit T is a true and correct copy of the Arrest Sheet of Lorena White, Bates Stamped D4034-D4036, dated September 11, 2011.

22. Attached hereto as Exhibit U is a true and correct copy of excerpts of the deposition transcript of Dr. Samir Maximos, dated September 17, 2014.

23. Attached hereto as Exhibit V is a true and correct copy of certain hospital records of Diana Williams, Bates Stamped NYC 000195, dated September 11, 2011.

24. Attached hereto as Exhibit W is a true and correct copy of excerpts of the deposition transcript of Christopher Maki, dated September 15, 2014.

25. Attached hereto as Exhibit X is a true and correct copy of medical records issued by Dr. Lisa Kornberg dated October 3, 2012.

26. Attached hereto as Exhibit Y is a true and correct copy of excerpts of the report of Plaintiff's Psychological Expert, Dr. Sandra Mays Clough dated September 23, 2014.

27. Attached hereto as Exhibit Z is a true and correct copy of the excerpts of the report of Plaintiff's American Sign Language Interpreting Expert, Richard Poor, dated November 11, 2014.

28. Attached hereto as Exhibit AA is a true and correct copy of excerpts of the deposition transcript of John Montaperto, dated October 8, 2014.

29. Attached hereto as Exhibit AB is a true and correct copy of excerpts of the deposition transcript of Martin Williams, dated October 6, 2014.

30. Attached hereto as Exhibit AC is a true and correct copy of excerpts of the deposition transcript of Patrick Volgende, dated August 18, 2014.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on: February 13, 2015
New York, New York

By: 
ANDREW ROZYNSKI, ESQ.